



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

July 26, 2016

Georgia Anastasiou
International Dioxide, Inc.
c/o Lewis & Harrison, LLC
122 C St. NW, Suite 505
Washington, DC 20001

Subject: Label Amendment – Addition of uses and label updates
Product Name: ADOX 3875 31% Aqueous Sodium Chlorite
EPA Registration Number: 9150-14
Application Date: April 19, 2016
Decision Number: 517094

Dear Ms. Anastasiou:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

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with FIFRA section 6. If you have any questions, you may contact Donna Kamarei at (703)347-0443 or via email at Kamarei.donna@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "DF", with a long horizontal stroke extending to the right.

Demson Fuller, Product Manager 32
Regulatory Management Branch II
Antimicrobials Division (7510P)
Office of Pesticide Programs

Enclosure

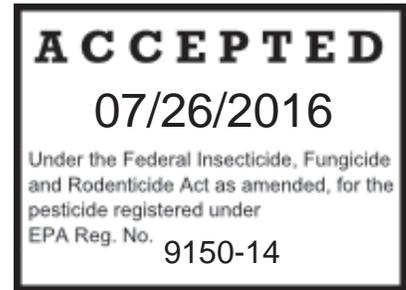
ADOX™ 3875

31% Aqueous Sodium Chlorite Solution

Precursor for Chlorine Dioxide and Acidified Chlorite Solutions
For Industrial Use Only

Active Ingredients

| | |
|------------------------|------|
| Sodium Chlorite..... | 31% |
| Other Ingredients..... | 69% |
| Total: | 100% |



KEEP OUT OF THE REACH OF CHILDREN

DANGER

See Side Panels for Additional Precautionary Statements

FIRST AID
IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
IF SWALLOWED: Call poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow.
Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.
IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

For 24 hour emergency information on this product, call **Chemtrec at 1-800-424-9300** (US, Canada, Puerto Rico, Virgin Islands) 1-703-527-3887 (All Other Areas) Medical Emergency 1-800-441-3637 (outside U.S. 302-774-1000)
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.
NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

EPA Reg. No. 9150-14
EPA Est. No. XXX-YYY-ZZZ

NET CONTENTS _____ GAL.

Manufactured for:
International Dioxide, Inc.
40 Whitecap Drive
North Kingstown, RI 02852

STORAGE AND DISPOSAL**DO NOT CONTAMINATE WATER, FOOD OR FEED BY STORAGE OR DISPOSAL**

PESTICIDE STORAGE: Store upright in cool, dry and well-ventilated place. Avoid excessive heat or freezing. Protect from contact with other chemicals; avoid storage with organic chemicals, acids, reducers and combustible material. Keep container tightly closed when not in use. In case of spills, flush and drain promptly to sewer with large quantities of water. Do not allow liquid to dry out because this could present a fire hazard. If fire occurs, extinguish with large volume of water. Avoid exposure to high temperatures during storage. Store remote from other chemicals and combustible materials. Do not skid or slide drums.

PESTICIDE DISPOSAL: Do not contaminate water, food, or feed by storage or disposal. Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to the label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: [Containers equal to or less than 5 gallons: Nonrefillable container. Do not reuse or refill this container. Triple rinse (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.]

[Containers over 5 gallons: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip container on its side and roll back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip back and forth several times. Turn the container over onto its other end and tip back and forth several times. Empty the rinsate into application equipment or mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.]

EMERGENCY HANDLING: In case of contamination or decomposition, do not reseal container. Isolate in an open, well-ventilated area. Flood with large volumes of water. Cool unopened drums in vicinity by water spray.

PRECAUTIONARY STATEMENTS**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

Corrosive. causes irreversible eye damage and skin burns. Do not get in eyes, on skin, or clothing. Wear goggles or face shield, protective clothing, use only Neoprene gloves and use only thoroughly clean dry utensils when handling this product. May be Fatal if swallowed. Irritating to Nose and Throat. Avoid breathing vapors. Vacate poorly ventilated areas as soon as possible. Do not return until strong odors have dissipated. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and

wash before reuse.

ENVIRONMENTAL HAZARDS

This product is toxic to fish and other aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

PHYSICAL OR CHEMICAL HAZARDS

DANGER: This product becomes a fire or explosive hazard if allowed to dry. Strong oxidizing agent. Mix or dilute into water only. Mixing with acids, or alcohol, or other chemicals may cause evolution of chlorine and chlorine dioxide gas mixture which is toxic and may be explosive. Combustible materials contaminated with ADOX™ 3875 may burn rapidly. Keep handling areas and equipment clean and free of oils, greases, combustibles, and dust. Do not contaminate this product with garbage, dirt, organic matter, paint products, solvents, acids, vinegar, beverages, oils, pine oils, dirty rags, or other foreign matter. Do not expose to hot surfaces, sparks or open flame.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

[† *Not approved for use in California*]

[METHOD OF APPLICATION

ADOX™ 3875 is a precursor for the generation of chlorine dioxide. [DO NOT ADD ADOX™ 3875 directly to the system being treated.] Chlorine dioxide solutions can be generated from ADOX™ 3875 by several common methods including:

1. The chlorine method which utilizes ADOX™ 3875 and chlorine gas, or
2. The hypochlorite method which utilizes ADOX™ 3875, a hypochlorite solution and an acid, or
3. The Acid-Chlorite method which utilizes ADOX™ 3875 and an acid, or
4. The electrolytic method which utilizes ADOX™ 3875, with sodium chloride as needed.

ADOX™ 3875 can also be used to form acidified sodium chlorite solutions by mixing the product with Generally Recognized As Safe (GRAS) acids such as citric, phosphoric or acetic acid. Add the generated chlorine dioxide solution to a point in the system which ensures uniform mixing. Your International Dioxide, Inc. representative can guide you in the selection, installation and operation for feed systems.]

APPLICATIONS

[POTABLE WATER AND WASTEWATER DISINFECTION: For most municipal and other potable water systems, a chlorine dioxide residual concentration up to 2.0 ppm is sufficient to provide adequate disinfection. Typically, the target residual concentrations range from 0.20 – 0.75 ppm. Monitor the distribution system to ensure that the chlorite concentration does not exceed its maximum contaminant level (MCL) of 1 mg/L and that chlorine dioxide does not exceed its maximum residual disinfection level (MRDL) of 0.8 mg/L. For wastewater and sewage applications, residual chlorine dioxide concentrations

up to 5.0 ppm are generally adequate.]

[[†]POTABLE WATER SYSTEMS: Nitrification: To control the buildup of nitrification in the water distribution system. Utilize a chemical metering system to add this product so that the resulting dose of chlorine dioxide or sodium chlorite to control nitrification does not exceed the MRDL of 0.8mg/L for ClO₂, or the MCL of 1.0 mg/L for chlorite ion.

Use of this product in public water systems (drinking water utilities) triggers monitoring and compliance requirements under 40 CFR 141. Among other requirements the user of this product is required to conduct daily monitoring for chlorine dioxide and chlorite at the point of addition and to comply with standards for chlorine dioxide and chlorite. The user of this product is required to contact State or primary drinking water programs to determine specific monitoring, compliance, reporting, and record-keeping requirements in order to avoid adverse human health effects and/or non-compliance with such requirements.]

[IRRIGATION AND IRRIGATION WATER SYSTEMS

IRRIGATION: To control bacteria, algae and slime in irrigation piping and emitters for field and greenhouse / hothouse applications treat continuously or with a slug dose.

WATER RESERVOIRS: To control bacteria, algae, slime and reduce nitrification treat continuously or with a slug dose.

SLUG DOSE: Add 42 to 210 pounds of chlorine dioxide per million gallons of water (5 to 25 ppm).

CONTINUOUS DOSE: Add 2 to 16 pounds of chlorine dioxide per million gallons of water (0.25 to 2 ppm).]

[GENERAL INDUSTRIAL PROCESS WATER TREATMENT (OILFIELD INJECTION WATER, [†]WHITE WATER PAPER MILL SYSTEMS, and RECIRCULATING COOLING TOWERS): For control of microbial slime, these systems will require a chlorine dioxide residual concentration ranging between 0.25 and 5.0 ppm.]

[[†]ONCE THROUGH COOLING WATER SYSTEMS: Control of mollusks can be effectively accomplished using ADOX™ 3875 as directed in commercial and industrial once through cooling water systems. ADOX™ 3875 may be fed on a continuous or slug basis depending on the degree of system fouling. **SLUG DOSE:** Add 42 to 210 lbs. of chlorine dioxide per million gallons of water (5 to 25 ppm). **CONTINUOUS DOSE:** Add 2 to 16 lbs. of chlorine dioxide per million gallons of water (0.25 to 2 ppm).]

[FOOD PROCESSING PLANTS, DAIRIES, BOTTLING PLANTS AND BREWERIES, FOOD PLANTS PROCESS WATER. For microbial control in typical food processing water systems, such as flume transport, chill water systems, hydrocoolers, and other water systems, apply ADOX™ 3875 through a chlorine dioxide generation system to achieve a chlorine dioxide residual concentration ranging from 0.25 to 3.0 ppm.]

[POULTRY PROCESSING WATER: Use ADOX™ 3875 to generate chlorine dioxide for use as an antimicrobial agent in water used in poultry processing in an amount not to exceed 3 ppm residual chlorine dioxide as determined by an appropriate method.]

[DIRECTIONS FOR TREATING ENHANCED OIL & GAS EXPLORATION AND RECOVERY SYSTEMS including primary, secondary or tertiary oil and gas recovery, plus oil sands processing waters.

Note: Addition of chlorine dioxide generated from ADOX™ 3875 must be made at the free water knockouts, before or after the injection pumps and injection well headers. For microbial control in oil field water, polymer or micellar floods, water-disposal systems, or other oil field water systems, ADOX™ generator systems are the preferred method of addition.

Continuous Feed Method: Treat water, aqueous solutions, suspensions, dispersions, mud, fluids until a residual of 0.25 (1.19 [California minimum]) to 10.0 ppm chlorine dioxide is achieved.

The required dosage rate, frequency and concentration of chlorine dioxide can vary for each individual user, depending on the severity of contamination, temperature and pH. Typical concentrations of chlorine dioxide are between 0.25 (1.19 [California minimum]) and 5.0 ppm above the chemical (chlorine dioxide) demand of the system on a continuous bases, but may require up to 10.0 ppm.

The aqueous chlorine dioxide stream from the generator must always be injected or introduced below the surface of the treated water/suspension/fluid/slurry, preferably while flowing or mixing. Allowing the aqueous chlorine dioxide stream to free-fall through air results in a loss of chlorine dioxide gas to the atmosphere.]

[IN FOOD PROCESSING FACILITIES

For use as a terminal food contact surface sanitizing rinse conforming to 40 CFR 180.940 paragraph (b) and (c) not requiring a subsequent potable water rinse. This solution may be used on hard surfaces such as dairy processing equipment, food processing equipment and utensils.

1. All equipment & utensils must be thoroughly cleaned to remove gross food particles and soil by pre-flush or pre-scrape and where necessary a pre-soak treatment. The surfaces or objects must then be cleaned with a detergent or cleaner followed by a potable water rinse before application of the sanitizing solution.
2. To prepare a 200 ppm chlorine dioxide sanitizing use solution add 5 oz. of ADOX™ 3875 to 50 gallons of water and then acidify to pH 2.6 with a Generally Recognized As Safe (GRAS) acid such as hydrochloric, citric, phosphoric or acetic acid. Allow to stand for at least 15 minutes before use. Alternatively to minimize worker handling, an automated system can be utilized that will safely react ADOX™ 3875 with a GRAS acid and safely dilute the solution to the 200 ppm chlorine dioxide sanitizing use solution.
3. Fill, immerse, circulate, wipe or spray the target surface with the sanitizing solution making sure the surface area is thoroughly wet for at least one minute. Hard to reach in-place equipment, pipes, closed vessels, etc. must be filled with the sanitizing solution to ensure contact of all surfaces. Use suitable breathing apparatus when spraying the solution on external equipment.
4. Allow the sanitizing solution to drain from all treated surfaces and air dry. Do not rinse treated surface.
5. The above solution must not be reused for sanitizing, but can be diluted 1:5 with water and used for cleaning of walls, floors and drains of the plant.]

[USES REGULATED BY FDA UNDER THE FEDERAL, FOOD, DRUG AND COSMETIC ACT

[ADOX™ 3875 can be used under US Food and Drug Administration (FDA) regulations 21 CFR 173.300 for poultry processing water and as an antimicrobial agent in water used to wash fruits and vegetables that are not raw agricultural commodities.]

[ADOX™ 3875 can be used to prepare acidified sodium chlorite solutions under US Food and Drug Administration (FDA) regulations 21 CFR 173.325 for use in; poultry processing water, processing of red meat, red meat parts, and organs, an antimicrobial agent in water and ice that are used to rinse, wash, thaw, transport, or store seafood, an antimicrobial agent in the water applied to processed fruits and vegetables.]]

[When used as directed under Environmental Protection Agency (EPA) regulations ADOX™ 3875 is a precursor for the generation of up to 3.0 ppm residual solutions of chlorine dioxide to:

1. Provide microbial control in wash or process water for fruit and vegetable raw agricultural commodities.
2. Control spoilage and decay causing non-public health microorganisms present in the wash or process water for fruit and vegetable raw agricultural commodities
3. Provide microbial control in poultry processing chiller water.]

[WARRANTY: Seller expressly warrants that the product conforms to its chemical description. There are no warranties associated with the sale of the product either express or implied including, but not limited to, the warranties of fitness for a particular purpose or use.]

[All LOGOS / 3rd Party Certifications are OPTIONAL]

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ADOX is registered trademark or trademark of International Dioxide, Inc.



Certified to NSF/ANSI 60
Max. Use Level 23 mg/L

[OPTIONAL MARKETING CLAIMS]

- [FOR CONTROLLING BACTERIA; INCLUDING SULFATE-REDUCING AND SLIME-FORMING BACTERIA, IN OIL & GAS PRODUCTION SYSTEMS.]
- [FOR USE IN TREATING WATER FOR HYDRAULIC FRACTURING]
- [OIL FIELD WATER TREATMENT OF FRACTURING, PRODUCED, DISPOSAL, OUTFALL, INJECTED, DOWN-HOLE, AND CO-MINGLED WATERS]
- [ENHANCED OIL RECOVERY SYSTEMS INCLUDING; PRIMARY, SECONDARY OR TERTIARY OIL AND GAS RECOVERY]
- [OIL SANDS PROCESSING WATERS]
- [SHALE OIL & GAS PROCESSING WATERS]
- [ENHANCED OIL RECOVERY SYSTEMS & OIL-FIELD INJECTION WATERS]
- [OIL-FIELD WATER SYSTEMS]
- [OIL AND GAS PRODUCTION & TRANSMISSION PIPELINES AND SYSTEMS]
- [AS STORAGE FIELDS AND EQUIPMENT, SUCH AS STEAM-INJECTION WATER HOLDING TANKS]
- [FLOOD WATER OR INJECTION WATER]
- [PRODUCED WATER]
- [FRACTURING FLUIDS]
- [HOLDING POND WATER AND HOLDING TANK WATER]
- [DISPOSAL-WELL WATER]
- [HOLDING TANKS]
- [DRILLING FLUIDS AND DRILLING MUDS]
- [COMPLETION FLUIDS AND COMPLETION MUDS]
- [WORKOVER FLUIDS AND WORKOVER MUDS]
- [PACKER FLUIDS AND PACKER MUDS]
- [DISPOSAL WATER]
- [REMOVING, CONTROLLING OR PREVENTING SLIME [AND MICROBIAL] IN OIL & GAS APPLICATIONS]
- [REMOVING, CONTROLLING OR PREVENTING BIOFOULING IN OIL & GAS APPLICATIONS]